

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER, JOHN
DOES 1 THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON
CORPORATION'S ASSENTED-TO MOTION TO IMPOUND THEIR OPPOSITION
TO PLAINTIFF SHAREHOLDER.COM'S MOTION TO
COMPEL A SECOND DEPOSITION OF ANDREW AUGUSTINE**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") (collectively, "Defendants") submit this Motion to Impound their Opposition to Plaintiff Shareholder.com's Motion to Compel a Second Deposition of Andrew Augustine ("Motion to Compel"). Impoundment is necessary because the Motion to Compel contains references to, and attaches copies of, documents produced by Defendants that have been designated as "Highly Confidential" under the terms of the Stipulated Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By its attorneys,

/s/ Karin M. Bell
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DATED: January 13, 2005

LOCAL RULE 7.1A(2) AND FED.R.CIV. P. 37(a) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2) and Fed. R. Civ. P. 37(a), counsel for Defendants certify that they have conferred in good faith with counsel for Shareholder, and counsel for Shareholder have assented to this motion.

s/ Karin M. Bell
Karin M. Bell

CERTIFICATE OF SERVICE

I hereby certify that this document filed, through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 13, 2006.

/s/ Karin M. Bell
Karin M. Bell